

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

PHI THETA KAPPA HONOR SOCIETY,

Plaintiff/Counter-Defendant,

v.

HONORSOCIETY.ORG INC.,

Defendant/Counter-Plaintiff

HONOR SOCIETY FOUNDATION, INC.,

Defendant.

Civil Action No. 3:22-cv-00208-CWR-RPM

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HONORSOCIETY.ORG INC.,

Defendant/Counter-Plaintiff/Third-  
Party Plaintiff

v.

LYNN TINCHER-LADNER,

Third-Party Defendant.

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**DECLARATION OF DEREK LINKE IN SUPPORT OF HONORSOCIETY'S  
RESPONSE IN OPPOSITION TO PTK'S MOTION FOR SUMMARY JUDGMENT**

I, Derek Linke, hereby declare, under 28 U.S.C. § 1746, as follows:

1. I am over 18 years of age, competent to testify to the matters stated herein, and make this declaration on the basis of personal knowledge.
2. I am an attorney at Newman LLP, and counsel of record for defendants HonorSociety.org Inc. and Honor Society Foundation, Inc. in this action.
3. This declaration is filed in support of HonorSociety's Response in Opposition to Phi Theta Kappa Honor Society's Motion for Summary Judgment.
4. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the transcript of the Deposition of Michael Moradian taken on January 3, 2024.
5. Attached hereto as **Exhibit 2** is a true and correct copy of Deposition Exhibit 536 from the Deposition of Lynn Tincher-Ladner on January 29, 2025.
6. Attached hereto as **Exhibit 3** is a true and correct copy of a document PTK produced in discovery as PTK0027317.
7. Attached hereto as **Exhibit 4** is a true and correct copy of a document PTK produced in discovery as PTK0027323.
8. Attached hereto as **Exhibit 5** is a true and correct copy of a document HonorSociety produced in discovery as HS\_365631.
9. Attached hereto as **Exhibit 6** is a true and correct copy of a document HonorSociety produced in discovery as HS\_367780.
10. Attached hereto as **Exhibit 7** is a true and correct copy of a document HonorSociety produced in discovery as HS\_136621.
11. Attached hereto as **Exhibit 8** is a true and correct copy of a document HonorSociety produced in discovery as HS\_129733.
12. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the transcript of the Deposition of Connor Hall taken on December 17, 2024.
13. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the transcript of the July 12, 2024 TRO Hearing.

14. Attached hereto as **Exhibit 11** is a true and correct copy of a document HonorSociety produced in discovery as HS\_612458.

15. Attached hereto as **Exhibit 12** is a true and correct copy of a document PTK produced in discovery as PTK0215898.

16. Attached hereto as **Exhibit 13** is a true and correct copy of Deposition Exhibit 530 from the Deposition of Lynn Tincher-Ladner on January 29, 2025.

17. Attached hereto as **Exhibit 14** is a true and correct copy of a document the Community College System of New Hampshire produced in discovery as CCSNH000504.

18. Attached hereto as **Exhibit 15** is a true and correct copy of a document HonorSociety produced in discovery as HS\_237979.

19. Attached hereto as **Exhibit 16** is a true and correct copy of a document HonorSociety produced in discovery as HS\_1005640.

20. Attached hereto as **Exhibit 17** is a true and correct copy of a document PTK produced in discovery as PTK0019820.

21. Attached hereto as **Exhibit 18** is a true and correct copy of a document PTK produced in discovery as PTK0137846.

22. Attached hereto as **Exhibit 19** is a true and correct copy of a document PTK produced in discovery as PTK0130729.

23. Attached hereto as **Exhibit 20** is a true and correct copy of a document PTK produced in discovery as PTK0001647.

24. Attached hereto as **Exhibit 21** is a true and correct copy of excerpts from the transcript of the Deposition of Lynn Tincher-Ladner taken on February 28, 2024.

25. Attached hereto as **Exhibit 22** is a true and correct copy of excerpts from the transcript of the Deposition of Lynn Tincher-Ladner taken on December 16, 2024.

26. Attached hereto as **Exhibit 23** is a true and correct copy of excerpts from the transcript of the Deposition of Lynn Tincher-Ladner taken on January 29, 2025.

27. Attached hereto as **Exhibit 24** is a true and correct copy of a document PTK produced in discovery as PTK0001943.

28. Attached hereto as **Exhibit 25** is a true and correct copy of a document HonorSociety produced in discovery as HS\_999984.

29. Attached hereto as **Exhibit 26** is a true and correct copy of a document PTK produced in discovery as PTK0028888.

30. Attached hereto as **Exhibit 27** is a true and correct copy of a document PTK produced in discovery as PTK0326725.

31. Attached hereto as **Exhibit 28** is a true and correct copy of a document HonorSociety produced in discovery as HS\_243126.

32. Attached hereto as **Exhibit 29** is a true and correct copy of a document the American Association of Community Colleges produced in discovery as AACC\_000954.

33. Attached hereto as **Exhibit 30** is a true and correct copy of a document the American Association of Community Colleges produced in discovery as AACC\_002001.

34. Attached hereto as **Exhibit 31** is a true and correct copy of a document the American Association of Community Colleges produced in discovery as AACC\_000908.

35. Attached hereto as **Exhibit 32** is a true and correct copy of a document PTK produced in discovery as PTK0050209.

36. Attached hereto as **Exhibit 33** is a true and correct copy of a document PTK produced in discovery as PTK0070576.

37. Attached hereto as **Exhibit 34** is a true and correct copy of a document PTK produced in discovery as PTK0132512.

38. Attached hereto as **Exhibit 35** is a true and correct copy of a document PTK produced in discovery as PTK0132455.

39. Attached hereto as **Exhibit 36** is a true and correct copy of a document PTK produced in discovery as PTK0136581.

40. Attached hereto as **Exhibit 37** is a true and correct copy of a document PTK produced in discovery as PTK0064092.

41. Attached hereto as **Exhibit 38** is a true and correct copy of a document PTK produced in discovery as PTK0132288.

42. Attached hereto as **Exhibit 39** is a true and correct copy of a document PTK produced in discovery as PTK0062451.

43. Attached hereto as **Exhibit 40** is a true and correct copy of excerpts from the transcript of the Deposition of George Boggs taken on April 5, 2024.

44. Attached hereto as **Exhibit 41** is a true and correct copy of a document PTK produced in discovery as PTK0064023.

45. Attached hereto as **Exhibit 42** is a true and correct copy of a document PTK produced in discovery as PTK0123549.

46. Attached hereto as **Exhibit 43** is a true and correct copy of HonorSociety.org Inc.'s Registered Trademark, U.S. Reg. No. 4,662,343.

47. Attached hereto as **Exhibit 44** is a true and correct copy of a document PTK produced in discovery as PTK0132458.

48. Attached hereto as **Exhibit 45** is a true and correct copy of HonorSociety's Supplemental Responses to Lynn Tincher-Ladner's First Set of Interrogatories, dated November 8, 2024.

49. Attached hereto as **Exhibit 46** is a true and correct copy of a document PTK produced in discovery as PTK0182985.

50. Attached hereto as **Exhibit 47** is a true and correct copy of a document PTK produced in discovery as PTK0124125

51. Attached hereto as **Exhibit 48** is a true and correct copy of a document PTK produced in discovery as PTK0123724

52. Attached hereto as **Exhibit 49** is a true and correct copy of a document PTK produced in discovery as PTK0004588

53. Attached hereto as **Exhibit 50** is a true and correct copy of excerpts from the transcript of the July 17, 2024 TRO Hearing held in this matter.

54. Attached hereto as **Exhibit 51** is a true and correct copy of a document HonorSociety produced in discovery as HS\_584400.

55. Attached hereto as **Exhibit 52** is a true and correct copy of excerpts from the transcript of the Deposition of Michael Moradian taken on May 3, 2024.

56. Attached hereto as **Exhibit 53** is a true and correct copy of a document HonorSociety produced in discovery as HS\_220988.

57. Attached hereto as **Exhibit 54** is a true and correct copy of a document HonorSociety produced in discovery as HS\_013438.

58. Attached hereto as **Exhibit 55** is a true and correct copy of Deposition Exhibit 488 from the Deposition of Lynn Tincher-Ladner taken on December 16, 2024.

59. Attached hereto as **Exhibit 56** is a true and correct copy of a document PTK produced in discovery as PTK0027861.

60. Attached hereto as **Exhibit 57** is a true and correct copy of a document PTK produced in discovery as PTK0093238.

61. Attached hereto as **Exhibit 58** is a true and correct copy of a document PTK produced in discovery as PTK0093240.

62. Attached hereto as **Exhibit 59** is a true and correct copy of excerpts from the transcript of the Deposition of Michael Moradian taken on January 27, 2025.

63. Attached hereto as **Exhibit 60** is a true and correct copy of a document HonorSociety produced in discovery as HS\_584412.

64. Attached hereto as **Exhibit 61** is a true and correct copy of a document HonorSociety produced in discovery as HS\_584413.

65. Attached hereto as **Exhibit 62** is a true and correct copy of a document HonorSociety produced in discovery as HS\_584415.

66. Attached hereto as **Exhibit 63** is a true and correct copy of a document HonorSociety produced in discovery as HS\_584417.

67. Attached hereto as **Exhibit 64** is a true and correct copy of a document HonorSociety produced in discovery as HS\_584419.

68. Attached hereto as **Exhibit 65** is a true and correct copy of a document HonorSociety produced in discovery as HS\_584421.

69. Attached hereto as **Exhibit 66** is a true and correct copy of a document HonorSociety produced in discovery as HS\_584424.

70. Attached hereto as **Exhibit 67** is a true and correct copy of a document HonorSociety produced in discovery as HS\_584427.

71. Attached hereto as **Exhibit 68** is a true and correct copy of a document HonorSociety produced in discovery as HS\_662837.

72. Attached hereto as **Exhibit 69** is a true and correct copy of a document HonorSociety produced in discovery as HS\_1019936.

73. Attached hereto as **Exhibit 70** is a true and correct copy of a document HonorSociety produced in discovery as HS\_662847.

74. Attached hereto as **Exhibit 71** is a true and correct copy of a document HonorSociety produced in discovery as HS\_662833.

75. Attached hereto as **Exhibit 72** is a true and correct copy of a document HonorSociety produced in discovery as HS\_545271.

76. Attached hereto as **Exhibit 73** is a true and correct copy of a document the College of Western Idaho produced in discovery as CWI000004.

77. Attached hereto as **Exhibit 74** is a true and correct copy of a document the College of Western Idaho produced in discovery as CWI000005.

78. Attached hereto as **Exhibit 75** is a true and correct copy of a document PTK produced in discovery as PTK0132813.

I declare under the penalty of perjury under the laws of the United States of America that, to the best of my knowledge, the foregoing is true and correct.

Executed March 7, 2025

s/Derek Linke  
Derek Linke